

Exhibit C

Tracy Caekaert

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MONTANA
3 BILLINGS DIVISION
4 TRACY CAEKAERT and
5 CAMILLIA MAPLEY,
6 Plaintiffs, Case No. CV-20-00052-SPW-TJC
7 vs.
8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.,
10 WATCH TOWER BIBLE AND
11 TRACT SOCIETY OF
12 PENNSYLVANIA, and BRUCE
13 MAPLEY SR.,
14 Defendants.
15
16 _____
17 WATCHTOWER BIBLE AND TRACT
18 SOCIETY OF NEW YORK, INC.,
19 and WATCH TOWER BIBLE AND
20 TRACT SOCIETY OF
21 PENNSYLVANIA,
22 Cross-Claimants,
23 vs.
24 BRUCE MAPLEY SR.,
25 Cross-Defendant.

Tracy Caekaert

1
2 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION

3 UPON ORAL EXAMINATION OF

4 TRACY CAEKAERT
5

6 BE IT REMEMBERED, that the
7 videoconference/videotaped deposition upon oral
8 examination of Tracy Caekaert, appearing at the
9 instance of the Defendant Watch Tower Bible and
10 Tract Society of Pennsylvania, was taken at 211
11 North Higgins, Suite 303, Missoula, Montana, on
12 Friday, February 9, 2023, beginning at the hour of
13 9:11 a.m., pursuant to the Federal Rules of Civil
14 Procedure, before Mary R. Sullivan, Registered
15 Merit Reporter, Certified Realtime Reporter, and
16 Notary Public.
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Tracy Caekaert

1 A. No. At least I don't think I do. I
2 don't recall that I have that, no.

3 Q. In your adult life, did you ever have a
4 close relationship with Bruce, Sr.?

5 A. No.

6 MR. SHAFFER: How 'ya doing? Are you all
7 right?

8 THE DEPONENT: I'm doing good.

9 MR. SHAFFER: Do you want to take a
10 break, go to the bathroom?

11 THE DEPONENT: No, I'm okay.

12 MR. SHAFFER: Okay.

13 BY MR. SWEENEY:

14 Q. I want to talk to you about the abuse that
15 you allege against Bruce, Sr. in your complaint,
16 and I'll just read two of the paragraphs from your
17 complaint. Paragraph 33 says [As Read]: "Defendant
18 Mapley Sr. and his family, including Caekaert and
19 Mapley, joined the Hardin, Montana Congregation of
20 Jehovah's Witnesses ('Hardin Congregation') in or
21 around 1973 after being recruited by Gunner Haines
22 ('Haines') and his wife, Joyce Haines."

23 Actually I'm going to stop right there and
24 ask you a question. How was -- How was Mapley, Sr.
25 and his family recruited by Gunner Haines [sic] and

Tracy Caekaert

1 Joyce Hains?

2 A. From what I can recall, they were doing
3 door-to-door work and came to our home.

4 Q. Before that point, do you know if your
5 parents knew Gunner or Joyce?

6 A. No.

7 Q. You don't know or they didn't?

8 A. No, they didn't, as far as I know.

9 Q. Okay. The next paragraph states [As
10 Read]: "At that time, Mapley Sr. had been sexually
11 abusing Plaintiffs approximately twice a week for
12 several years. The abuse occurred whenever
13 Shirley Mapley left the house and generally
14 consisted of forced oral sex and fondling the
15 girls' genitals."

16 I read this to say that before your family
17 joined the Hardin congregation, Mapley, Sr. had
18 been sexually abusing you twice a week for several
19 years.

20 A. Yes.

21 Q. Is that an accurate statement?

22 A. Yes.

23 Q. Okay. In 1973, how old were you?

24 A. It was in '66, so that would put me, I
25 don't know, what's -- is that seven years?

Tracy Caekaert

1 Q. Approximately seven years old?

2 A. Yeah.

3 Q. Okay. And so when did the sexual abuse by
4 Bruce start? How old were you?

5 A. I was very young. I was probably
6 somewhere around the age of five.

7 Q. And where were you living at that time?

8 A. I recall -- My memory is I recall it
9 happening in Michigan.

10 Q. So it occurred before you were back to
11 Montana.

12 A. Yes.

13 Q. And continued to occur after you moved
14 back to Montana.

15 A. Yes.

16 Q. Is that true for Cami as well, do you
17 know?

18 A. Yes.

19 Q. Have you spoken to Cami about that?

20 A. Well, it happened with us together, so we
21 already know about that. As far as talking about
22 it, I -- I'm sure that we have, yes.

23 Q. Okay. Before you moved back to Montana,
24 where did the abuse occur? Was it in a home,
25 someplace else?

Tracy Caekaert

1 A. With me it was in my home. It was
2 also -- He would take me to other people's homes
3 when they were not home and sexually molest me in
4 other people's homes.

5 Q. He would take you to just vacant houses
6 and molest you there?

7 A. I'm assuming that they were people he was
8 friends with and had access to their home.

9 Q. Okay.

10 A. I can't say. I don't know.

11 Q. At that point before you moved back to
12 Montana, what did the sexual abuse consist of?

13 A. Gratifying him through oral sex, him
14 lubing up my legs with Vaseline and making me
15 cross my legs really tight and placing his penis
16 close to my vagina and motioning in a sexual
17 manner to gratify himself. Fondling or groping my
18 genitals, making me kiss him as I was a -- like a
19 lover. Just touching, fondling, groping, and just
20 gratifying him in any way that gave him sexual
21 pleasure.

22 Q. Before -- At that time before you moved
23 back to Montana, did -- how often would this
24 happen?

25 A. Every time my mom would leave the house.

Tracy Caekaert

1 Q. Was that weekly, daily? Can you give me
2 an idea of how often?

3 A. I understand she was on a bowling league,
4 so it could be several times a week.

5 Q. Did anybody ever witness this? And I'm
6 talking about the period before you moved to
7 Montana.

8 A. No.

9 Q. The complaint says that you or your family
10 joined the Hardin congregation in 1973. Is 1973
11 also the year your family moved back to Montana?

12 A. I remember that I was halfway through my
13 third grade year when we moved to -- to
14 Fort Smith.

15 Q. Okay. How long had your family lived in
16 Montana before they joined the Hardin congregation?

17 A. I was pretty young. I wouldn't be able
18 to really give you an accurate answer on that.

19 Q. This abuse from Bruce, did it continue
20 after you moved back to Montana?

21 A. Yes.

22 Q. And was the -- was it the same type of
23 abuse or anything --

24 A. Yes.

25 Q. -- different?

Tracy Caekaert

1 When did the abuse from Bruce, Sr. stop?

2 A. I was 17 years old -- and about four or
3 five months old when I finally stood up to him
4 when he tried to grope me, and I stood up and I
5 said, "You will never touch me again."

6 Q. Just so I'm clear, you're saying you were
7 17 and four or five months old?

8 A. Mm-hmm.

9 Q. During that time between when you were
10 five and when you were 17 -- I'll just say 17 and a
11 half, I know it was less than that, but 17 and a
12 half, did -- was the abuse always the same or did
13 it change throughout the years?

14 A. I would say that there was times it was
15 different for -- Are you asking for an instance?
16 What are you asking for?

17 Q. I'm just asking, you -- you described in
18 detail what the abuse consisted of before you moved
19 back to Montana. I'm curious if that changed at
20 all after you moved back to Montana or if it was
21 the same.

22 A. It was basically the same, and there was
23 a lot of groping, touching, using me to gratify
24 himself.

25 Q. Talking about when you're now in Montana

Tracy Caekaert

1 Q. Were you still living at the home at that
2 point?

3 A. Yes.

4 Q. How long did his abuse of Cami continue,
5 do you know?

6 A. No. That I don't know.

7 Q. Other than the one time Bruce broke down
8 crying telling the family that he had molested you,
9 did he ever -- were you ever present when he told
10 the family that again?

11 A. No.

12 Q. Did Bruce ever confess that he molested
13 you to anybody else?

14 MR. SHAFFER: Object to form.

15 A. That --

16 MR. SHAFFER: Foundation.

17 A. That I wouldn't know.

18 BY MR. SWEENEY:

19 Q. Nothing that you were a part of?

20 A. Nothing I was a part of. Well, you know,
21 that's -- Well, the thing is I don't know. All I
22 know is what happened afterwards. 'Cause
23 he -- from what I understand, he openly confessed
24 to -- to the elders.

25 Q. Were you present when that happened?

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1 A. No, that's what I think I'm trying to say
2 is, no, I wasn't present at that.

3 Q. Where do you get that understanding?

4 A. Not long after it happened Martin Svenson
5 got up on the podium at the end of the meeting and
6 made an announcement to the congregation that
7 Gunner was being removed -- he was being put on
8 public reproof, and he was being removed as a
9 ministerial servant.

10 After the meeting, I was in the back of
11 the Kingdom Hall, and Gunner's wife, Joyce Hain,
12 cornered me, stuck her finger in my face, and told
13 me "This is all your fault." She had her teeth
14 gritting, and she said, "It's all your fault, and
15 I want you to stay away from me and my family."

16 And then at that point, that I knew that
17 the elders knew because these men told them.

18 Q. Do you remember who the elders were at
19 that time?

20 A. Yes.

21 Q. Who were they?

22 A. Harold Rimby and Martin Svenson.

23 Q. Is Joyce Hain deceased?

24 A. Yes.

25 Q. Was your -- your father ever